

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Alexie Portz,
Jill Kedrowski,
Abigail Kantor,
Marilia Roque Diversi,
Fernanda Quintino dos Santos,
Maria Hauer,
Haley Bock,
Kaitlyn Babich,
Anna Lindell, and
Kiersten Rohde,
individually and on behalf of all those
similarly situated,

Plaintiffs,

vs.

St. Cloud State University and
Minnesota State Colleges and Universities,

Defendants.

Civil Action No.: 16-CV-01115 JRT/LIB

**PLAINTIFFS' MOTION TO STRIKE
DEFENDANTS' RULE 68 OFFER OF
JUDGMENT**

Plaintiffs Alexie Portz, Jill Kedrowski, Abigail Kantor, Marilia Roque Diversi, Fernanda Quintino dos Santos, Maria Hauer, Haley Bock, Kaitlyn Babich, Anna Lindell, and Kiersten Rohde ("Plaintiffs") respectfully move this Court for an Order striking Defendants' Rule 68 Offer of Judgment and declaring it to be of no effect. This Motion is made and based upon the attached memorandum of law, declarations and exhibits, existing court record, and arguments of counsel.

[SIGNATURE PAGE FOLLOWS]

Respectfully submitted,

FAFINSKI MARK & JOHNSON, P.A.

Dated: March 16, 2017

By: s/ Sharon L. Van Dyck
Donald Chance Mark, Jr. (#67659)
Sharon L. Van Dyck (#0183799)
Andrew T. James (#0390982)
Flagship Corporate Center
775 Prairie Center Drive, Suite 400
Eden Prairie, MN 55344
Telephone: (952) 995-9500
donald.mark@fmjlaw.com
sharon.vandyck@fmjlaw.com
andrew.james@fmjlaw.com

Attorneys for Plaintiffs